



**BellSouth Telecommunications, Inc.**

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REC'D. TN  
REGULATORY AUTH.  
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OFFICE OF THE  
EXECUTIVE SECRETARY

May 23, 2002

**VIA HAND DELIVERY**

Mr. David Waddell, Executive Secretary  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, Tennessee 37243

Re: *Complaint of US LEC of Tennessee, Inc. against Electric Power Board  
of Chattanooga*  
Docket No. 02-00562

Dear Mr. Waddell:

Enclosed are the original and thirteen copies of BellSouth's Petition for Leave  
to Intervene. Copies of the enclosed are being provided to counsel of record.

Very truly yours,

Guy M. Hicks

GMH/jej

Enclosure

447598

0850030326 25.00  
**PAID**  
5/23/02

BEFORE THE TENNESSEE REGULATORY AUTHORITY  
NASHVILLE, TENNESSEE

IN RE: *Complaint of US LEC of Tennessee, Inc. against Electric Power Board of Chattanooga*

Docket No. 02-00562

**PETITION OF BELL SOUTH TELECOMMUNICATIONS, INC.  
FOR LEAVE TO INTERVENE**

BellSouth Telecommunications, Inc., pursuant to T.C.A. §4-5-310 and T.C.A. §65-2-107, petitions the Tennessee Regulatory Authority (the "Authority") for leave to intervene in the above-captioned proceeding, and in support thereof states as follows:

1. Petitioner, a Georgia Corporation authorized to conduct and conducting a public utility business in the state of Tennessee, is engaged in furnishing exchange telephone service and intrastate (long distance) intraLATA telephone service in the state of Tennessee subject to the jurisdiction of the Authority and pursuant to T.C.A. §65-4-101 and T.C.A. §65-5-201, *et seq.*

2. Petitioner competes directly against the Electric Power Board of Chattanooga in Chattanooga and has an interest in this case.

3. Petitioner's legal interests may be determined in the proceedings and Petitioner's interests will not be adequately represented unless the Authority allows the Petitioner to intervene.

4. Allowing Petitioner to intervene will not impair the interests of justice or the orderly and prompt conduct of these proceedings.

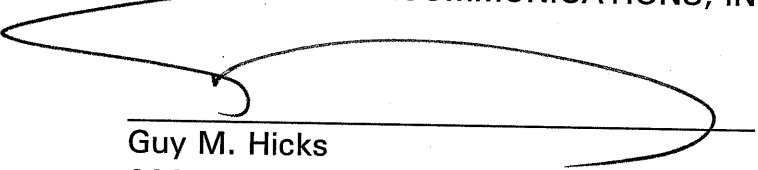
5. Petitioner respectfully requests that it be granted leave to intervene and participate as a party in the above-captioned proceeding.

WHEREFORE, Petitioner prays:

1. That it be permitted to intervene in this proceeding and participate as a party.
2. That Petitioner have such other and further relief to which it may be entitled.

Respectfully submitted,

BELLSOUTH TELECOMMUNICATIONS, INC.



\_\_\_\_\_  
Guy M. Hicks  
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(615) 214-6301

**CERTIFICATE OF SERVICE**

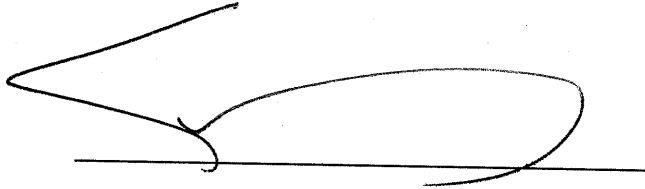
I hereby certify that on May 23, 2002, a copy of the foregoing document was served on the parties of record, via the method indicated:

- ☐ Hand
- ☒ Mail
- ☐ Facsimile
- ☐ Overnight

Henry Walker, Esquire  
Boult, Cummings, et al.  
414 Union Street, #1600  
Nashville, TN 37219-8062

- ☐ Hand
- ☒ Mail
- ☐ Facsimile
- ☐ Overnight

William C. Carriger, Esquire  
Strang, Fletcher  
One Union Sq., #400  
Chattanooga, TN 37402

A handwritten signature in black ink, appearing to read 'William C. Carriger', is written over a horizontal line.